EXHIBIT P

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

DELTON GOODRUM)	
Plaintiff,)	
v.) Case No. 1:24-cv-01111 (PTG/WEF)	
CITY OF ALEXANDRIA, a municipal. Corporation of Virginia))	
Defendant.)))	

DECLARATION OF SCOTT PATTERSON

- I, Scott Patterson, declare as follows:
- 1. My name is Scott Patterson.
- 2. I am over the age of eighteen (18) and have personal knowledge of the facts declared within.
- 3. I began my employment the Alexandria Police Department in December of 1996 and retired from the Department in July of 2024.
- 4. On June 30, 2021, I attended a Lieutenant's meeting wherein Hayes announced that he was going to promote Lt. Delton Goodrum to Captain first because Lt. Goodrum is Black and he felt there needed to be more higher-level Black commanders in the Department.
- 5. Chief Hayes did not say anything about Lt. Goodrum's merits or qualifications during the June 30, 2021 Lieutenant's meeting.
- 6. Chief Hayes came to my office the following day to explain his statement about Lt. Goodrum during the meeting.
- 7. I was on the Captain eligibility list, but I was not among the top three candidates.
- 8. Hayes told me that his statement at the meeting was only in reference to the top three candidates on the eligibility list.
- 9. This is not consistent with Hayes' actual statements at the meeting on June 30, 2021.

10. I told Hayes that, strictly speaking about the top three candidates, I agreed that Lt. Goodrum should be promoted first. I explained to Hayes that I based my assessment on the work Lt. Goodrum has done for the Department, his performance, and his experience as a commander on the Special Operations Team, a very difficult position.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 25/01, 2025.

Scott Patterson

Scott Patterson

Declaration of Scott Patterson vWitness Review - Revised

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